

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBL Y, AARON WOLKIND, STEVE  
HARTLEY, RICHARD SCHWETZ, JOBEL BARBOSA,  
MATTHEW REIDINGER, JOHN HUGO, SEAN-  
MICHAEL DAVID SCOTT, THOMAS LOUDEN,  
ZACHARY REHL, AMANDA REHL, K.R., a minor, by  
and through her father ZACHARY REHL, and her mother  
AMANDA REHL, MARK ANTHONY TUCCI,

Plaintiffs,

vs.

CHRISTIAN EXOO a/k/a ANTIFASH GORDON, ST.  
LAWRENCE UNIVERSITY, TRIBUNE PUBLISHING  
COMPANY; NEW YORK DAILY NEWS, VIJAYA  
GADDE, TWITTER, INC., COHEN, WEISS AND  
SIMON, LLP, NICK STRICKLAND, TORCH ANTIFA  
NETWORK, UNNAMED ASSOCIATES 1-100

Defendants.

CIVIL ACTION

NO.: 2:20-cv-  
12880-  
JMV-JSA

Hon. John M.  
Vazquez, U.S.D.J.

**JOINT APPLICATION BY DEFENDANTS CHRISTIAN EXOO, NEW YORK  
DAILY NEWS, TRIBUNE PUBLISHING COMPANY, ST. LAWRENCE  
UNIVERSITY, COHEN WEISS & SIMON, LLP, TWITTER, INC. AND  
VIJAYA GADDE FOR A JUDICIAL ORDER EXTENDING TIME TO  
ANSWER THE SECOND AMENDED COMPLAINT OR OTHERWISE  
RESPOND PURSUANT TO LOCAL CIVIL RULE 6.1.**

Application is hereby made to the Honorable Judge John M. Vazquez of the  
United States District Court for the District of New Jersey by the undersigned  
attorneys for Defendants who have appeared in the action (the "Moving  
Defendants") for an extension of time within which to answer or otherwise respond

to the Second Amended Complaint herein for a period of forty-five (45) days pursuant to Local Civil Rule 6.1 or in the alternative, fourteen (14) days pursuant to the Rule 6.1(b). The Moving Defendants include Defendants Christian Exoo, St. Lawrence University (“St. Lawrence”), Tribune Publishing Company (“Tribune”), New York Daily News (“Daily News”), Cohen Weiss & Simon, LLP, Twitter, Inc. and Vijaya Gadde (Twitter, Inc. “Twitter Defendants”).<sup>1</sup>

It is represented that:

1. There have been no prior extensions of time to answer or otherwise respond granted to the Moving Defendants with respect to the Second Amended Complaint, other than the 14-day extension previously granted to the Twitter Defendants. *See* fn 1.
2. Defendants received a copy of the Second Amended Complaint on November 30, 2021.
3. The Twitter Defendants’ responsive pleading is due on or before December 28, 2021, while the other Moving Defendants’ responsive pleading is due on or before December 14, 2021.

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<sup>1</sup> The Twitter Defendants previously sought a fourteen-day extension pursuant to Local Civil Rule 6.1(b), which the Court granted. *See* ECF No. 104. The Twitter Defendants also join the motion to seek an additional 31-day extension through this motion, which would align their deadline with the deadline for the other Defendants.

4. The time for any of the Moving Defendants to respond to the Second Amended Complaint has not yet expired.

On December 7, 2021, counsel for St. Lawrence, on behalf of the Moving Defendants, sought, by email to Plaintiffs' counsel, Plaintiffs' consent to the extension requested herein. Plaintiffs' counsel has not responded to the request for consent.

The Moving Defendants believe the extension is warranted. Given the upcoming winter holidays and since the Second Amended Complaint adds new parties who will have to be served and given time to respond to the pleading, the proposed extension will not delay the prosecution of the action and will ensure that all Defendants will move forward on the same briefing schedule.

WHEREFORE, the Moving Defendants respectfully request that their time to answer or otherwise respond to the Second Amended Complaint is extended for a period of forty-five (45) days up to and including January 28, 2021, pursuant to Local Civil Rule 6.1 of the United States District Court for the District of New Jersey or in the alternative extended for a period of 14 days pursuant to Local Civil Rule 6.1(b).

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Dated: December 9, 2021